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October 8, 1996

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BY MESSENGER

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

Re: In the Matter of Advanced Television  
Systems and Their Impact Upon the Existing  
Television Broadcast Service  
MM Docket No. 87-268

Dear Mr. Caton:

The Association for Maximum Service Television  
("MSTV") hereby notifies the Commission that MSTV sent the  
enclosed letter to Richard M. Smith, Chief of the Office of  
Engineering and Technology, in response to a letter Mr. Smith  
sent to Margita White of MSTV.

Sincerely,

*Ellen P. Goodman/vmh*

Ellen P. Goodman

Attorney for  
Association of Maximum  
Service Television, Inc.

Attachments

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*001*

ASSOCIATION FOR MAXIMUM SERVICE TELEVISION, INC.



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October 8, 1996

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1776 Massachusetts Ave., NW

Suite 310

Washington, DC 20036

Federal Communications Commission  
Office of Secretary

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Richard M. Smith  
Chief, Office of Engineering and Technology  
Federal Communications Commission  
2020 M Street, NW  
Washington, DC 20554

Victor Towill  
Vice President

Dear Dick:

Thanks for your letter to Margita of October 4, 1996, following up on MSTV's meeting with Chairman Hundt on October 3. We would be pleased to meet with you, but unfortunately this week is consumed by our efforts to build broadcaster consensus with respect to the allotment/assignment process.

What we told Chairman Hundt was that we regarded the Sixth Further Notice on the allotment/assignment issues as constituting excellent progress toward an effective table of DTV allotments/assignments, but that there are a number of improvements that broadcasters will recommend in response to the Commission's invitation for suggestions to improve the table. The first step in that process is to correct certain situations, approximately 45 in number, that, as we told Chairman Hundt, consist of mistakes and other differences not driven by the core channel and channel 60-69 proposals.

This list consists of the assignment of the same channel to different stations in the same community (an error that you have already corrected), the assignment of channel 3 and 4 stations in the same market which poses serious problems for VCRs and set-top boxes (problems you recognize), the use of VHF interference planning factors that are at odds with those adopted by ACATS, situations where the proposed table assigns adjacent channels in the same market but not on an exactly co-located basis, assignments inconsistent with the Land Mobile spacing rules proposed in the Notice, and violations of minimum separation requirements vis-a-vis Canada and Mexico.



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Some of these situations, as specifically identified in the enclosed list, are not appropriately characterized as inadvertent errors, but, however characterized, we believe they should be fixed. This is so, regardless of whether the Commission ultimately adopts the channel 7-51 core concept or the channel 60-69 "early-return" proposal contained in the Sixth Further Notice. We will get back to you to schedule a get-together next week. In the meantime, we will be following up with others on the Chairman's staff who have raised similar questions.

Sincerely,



Victor Tawil

Enclosure

cc: Reed E. Hundt  
Robert M. Pepper  
Blair Levin

VT/lym



Federal Communications Commission  
Washington, D.C. 20554

October 4, 1996

Ms. Margita E. White  
President  
Association for Maximum Service Television, Inc.  
1776 Massachusetts Ave., N.W.  
Suite 310  
Washington, D.C. 20036

Dear Margita:

Yesterday, a group of MSTV representatives met with Chairman Hundt to discuss channel allotments for digital television. I have been informed that they told Chairman Hundt that MSTV wants to work with the Commission in a cooperative fashion to develop the best possible allotment plan. In addition, I have been informed that MSTV had identified approximately 45 "inadvertent" errors in the FCC's draft DTV Table of Allotments that was included in the recently released Sixth Further Notice of Proposed Rule Making in MM Docket No. 87-268. The group indicated that it had shared this information with the Commission's staff.

We welcome the opportunity to work with MSTV on this very important matter that will affect all television broadcasters. To date we are only aware of one error in the original draft DTV Table-- a typographical error that made it appear that the same channel number was assigned twice in the same market. This error was corrected in an Erratum released September 12, 1996. We are unaware of any additional errors in the Table or any discussion of these "inadvertent" errors by MSTV with FCC staff. We would appreciate your notifying us immediately the additional 44 errors mentioned in the meeting with Chairman Hundt.

We appreciate your assistance in this matter.

Sincerely,

A handwritten signature in cursive script, reading "Richard M. Smith".

Richard M. Smith  
Chief  
Office of Engineering and Technology

cc: Reed E. Hundt  
Blair Levin